

George Haines, Esq.
Nevada Bar No. 9411
Gerardo Avalos, Esq.
Nevada Bar No. 15171
FREEDOM LAW FIRM, LLC
8985 South Eastern Ave., Suite 100
Las Vegas, NV 89123
ghaines@freedomlegalteam.com
gavalos@freedomlegalteam.com
Phone: (702) 880-5554
FAX: (702) 385-5518
Attorneys for Plaintiff Elsie Bryant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Elsie Bryant,

Plaintiff,
v.

Experian Information Solutions, Inc.;
Equifax Information Services LLC;
Concora Credit Inc. dba Feb
Retail/CCI and WebBank,

Defendants.

| Case No.: 2:2025-cv-00015

Discovery Plan and Scheduling Order Submitted in Compliance with LR 26-1(b)

1 On April 10, 2025, WebBank appeared in this case and the Court set a
2 deadline to file a proposed discovery plan and scheduling order by May 25, 2025.
3 Accordingly, Elsie Bryant and Equifax Information Services LLC (collectively as
4 the “Parties”), by and through their respective counsel, hereby submit this Joint
5 Discovery Plan and Scheduling Order. The parties will require 180 days of discovery
6 measured from the date that WebBank filed its answer to Plaintiff’s complaint.
7

8

9 DISCOVERY PLAN

10 The parties propose the following discovery plan and scheduling order:

- 11 1. Initial disclosures June 9, 2025
12 2. Amend pleadings and add parties .. July 9, 2025
13 3. Expert disclosures (initial): August 8, 2025
14 4. Expert disclosures (rebuttal): September 8, 2025
15 5. Discovery cutoff date: October 7, 2025
16 6. Dispositive motions: November 6, 2025
17 7. Pretrial order December 8, 2025

18 In the event that dispositive motions are filed, the date for filing the joint
19 pretrial order shall be suspended until **30 days after** decision on the dispositive
motions or until further order of the court.

20 Pretrial Disclosures: The disclosures required by Rule 26(a)(3), and any
21 objections thereto, shall be included in the joint pretrial order.

22 Extensions or Modifications of the Discovery Plan and Scheduling Order:
23 Applications to extend any date set by the discovery plan, scheduling order, or other
24 order must comply with the Local Rules.
25
26

1 Protective Order: The parties may seek to enter a stipulated protective order
2 pursuant to Rule 26(c) prior to producing any confidential documents.

3 Electronic Service: The parties agree that pursuant to Rules 5(b)(2)(E) and
4 6(d) of the Federal Rules of Civil Procedure any pleadings or other papers may be
5 served by sending such documents by email.

6 Alternative Dispute Resolution Certification: The parties certify that they met
7 and conferred about the possibility of using alternative dispute-resolution processes
8 including mediation, arbitration, and early neutral evaluation. The parties have not
9 reached any stipulations at this stage.

10 Alternative Forms of Case Disposition Certification: The parties certify that
11 they considered consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and
12 Fed. R. Civ. P. 73 and the use of the Short Trial Program (General Order 2013-01).
13 The parties have not reached any stipulations at this stage.

14 Electronically Stored Information: The parties have discussed the retention
15 and production of electronic data. The parties agree that service of discovery by
16 electronic means, including sending original electronic files by email or on a cd is
17 sufficient. The parties reserve the right to revisit this issue if a dispute or need arises.

18 Electronic evidence conference certification: The parties further intend to
19 present evidence in electronic format to jurors for the purposes of jury deliberations
20
21
22
23
24
25
26
27
28

1 at trial. The parties discussed the presentation of evidence for juror deliberations but
2 did not reach any stipulations as to the method at this early stage.

3 Dated: May 20, 2025.
4

5 **FREEDOM LAW FIRM**

6 /s/ George Haines
7 George Haines, Esq.
8 Gerardo Avalos, Esq.
9 8985 South Eastern Ave., Suite 100
Las Vegas, NV 89123
10 *Counsel for Plaintiff Elsie Bryant*

11 **CLARK HILL PLLC**
12

13 /s/ Gia N. Marina
14 Gia N. Marina, Esq.
Clark Hill PLLC
15 1700 S. Pavilion Center Drive, Suite 500
Las Vegas, NV 89135
16 *Counsel for Equifax Information Services LLC*

SCHEDULING ORDER

The above-set stipulated Discovery Plan of the parties shall be the Scheduling Order for this action pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.

IT IS SO ORDERED:

Berlwek

UNITED STATES MAGISTRATE JUDGE

DATED: 5/22/2025